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Arizona Corporation Commission

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JUN 23 2015

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Attorneys for Liberty Utilities (Black Mountain Sewer) Corp.

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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (BLACK
MOUNTAIN SEWER) CORP., AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASES IN ITS
WASTEWATER RATES AND CHARGES
FOR UTILITY SERVICE BASED
THEREON.

DOCKET NO: SW-02361A-15-0207

MOTION TO CONSOLIDATE

Liberty Utilities (Black Mountain Sewer) Corp. ("Liberty Black Mountain" or "Company") hereby moves to consolidate the above-captioned matter with the financing application filed by Liberty Black Mountain in Docket No. SW-02361A-15-0206. Such relief is warranted because the issues in the two dockets are inextricably linked. The Company has used the debt subject to this application in its capital structure in the rate application. In addition, consolidation will result in administrative efficiency and economy as only one proceeding will be necessary to decide these interrelated applications.

Publication/mailing of the Public Notice regarding the financing application is currently due July 2, 2015. It would be preferable for the Company to send out one notice, advising Liberty Black Mountain customers of both proceedings at the same time.

1 Thus, new notice requirements should be addressed if the motion to consolidate is
2 granted.

3 Liberty Black Mountain asks that the Commission issue an order granting the
4 request for consolidation.

5 RESPECTFULLY SUBMITTED this 23rd day of June, 2015.

6 SHAPIRO LAW FIRM, P.C.

7
8 By: 
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12 and

13 LIBERTY UTILITIES

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18 Attorneys for Liberty Utilities
19 (Black Mountain Sewer) Corp.

20 ORIGINAL and thirteen (13) copies
21 of the foregoing were delivered
22 this 23rd day of June, 2015, to:

23 Docket Control
24 Arizona Corporation Commission
25 1200 W. Washington Street
26 Phoenix, AZ 85007

By: 